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15 Attorneys for Plaintiffs

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 TRISHA WREN, et al.,
21 Plaintiffs,
22 v.
23 RGIS INVENTORY SPECIALISTS,
24 Defendant.

Case No. 3:06-cv-5778 JCS

**[PROPOSED] PRE-TRIAL
SCHEDULING ORDER AND JOINT
DISCOVERY PLAN PURSUANT TO
COURT'S MARCH 31, 2008 ORDER**

PROPOSED PRE-TRIAL SCHEDULING ORDER AND JOINT DISCOVERY**PLAN**

Plaintiffs Trisha Wren, et al. ("Plaintiffs") and Defendant RGIS, LLC ("RGIS") (collectively, "Parties"), having met and conferred pursuant to the Court's March 31, 2008 Order for the purpose of developing a proposed schedule to move the current discovery and pre-trial deadlines by 90 days. The Parties hereby submit a Proposed Pre-Trial Scheduling Order and Joint Discovery Plan as follows:

Discovery Plan

1. Deadline for non-expert discovery, including fact discovery, shall be **September 18, 2008**.
2. Parties shall identify experts and provide expert reports by **September 18, 2008**.
3. Deadline for completion of expert discovery, including expert depositions, shall be **October 27, 2008**.

Pre-Trial Schedule

4. Plaintiffs shall file their Rule 23 motion by **July 3, 2008**. RGIS shall file its opposition by **July 31, 2008**. Plaintiffs shall file their reply in support of Rule 23 motion by **August 14, 2008**.
5. The hearing on Plaintiffs' Rule 23 motion shall be ^{September 12, 2008} ~~September 4, 2008~~ at 9:30 a.m.
6. RGIS shall file its motion to decertify the FLSA class by **September 18, 2008**. Plaintiffs shall file their opposition by **October 16, 2008**. RGIS shall file its reply in support of decertification by **October 30, 2008**.
7. The hearing on RGIS' motion to decertify the FLSA class shall be **November 21, 2008** at 9:30 a.m.

1 8. Deadline for filing summary judgment motions shall be **October 31, 2008**.

2 9. Deadline for filing opposition papers to summary judgment motions shall
3 be **November 19, 2008**.

4 10. Deadline for filing reply papers to summary judgment motions shall be
5 **December 2, 2008**.

6 11. The hearing on motions for summary judgment shall be **December 19,**
7 **2008** at 9:30 a.m.

8 March 20, 2009
9 12. The Final Pre-Trial Conference shall be held on ~~March 19, 2009~~ at 1:30
10 p.m.

11 13. The Trial shall commence on **April 13, 2009** at 8:30 a.m. Trial is presently
12 estimated to last for 11 days.

13 Respectfully submitted,

14 Dated: April __, 2008

SCHNEIDER & WALLACE

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16 GUY B. WALLACE

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18 Attorneys for Plaintiffs
19 TRISHA WREN, *et al.*

20 Dated: April 4, 2008

DRINKER BIDDLE & REATH LLP

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22 CHERYL D. ORR

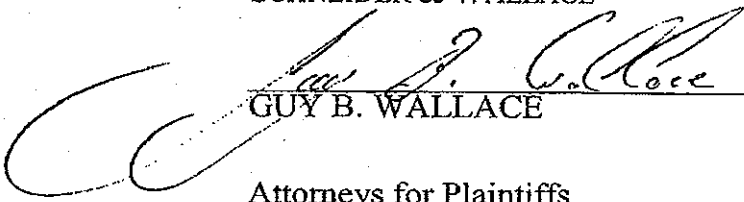
23 Attorneys for Defendant
24 RGIS LLC, formerly known as
25 RGIS INVENTORY SPECIALISTS
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SCHNEIDER & WALLACE


GUY B. WALLACE

Attorneys for Plaintiffs
TRISHA WREN, *et al.*

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20 Dated: April __, 2008

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23 CHERYL D. ORR

Attorneys for Defendant
RGIS LLC, formerly known as
RGIS INVENTORY SPECIALISTS

CERTIFICATION

I attest that Guy B. Wallace has concurred in the filing of this document.

Dated: April 4, 2008

DRINKER BIDDLE & REATH LLP


CHERYL D. ORR

1 **IT IS SO ORDERED.**

2
3 Dated: April 15, 2008

